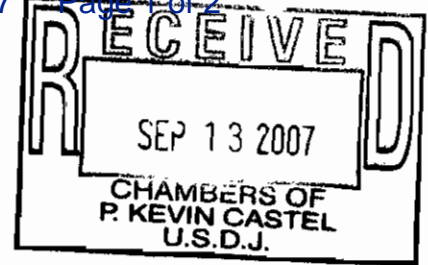


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MEMO ENDORSED

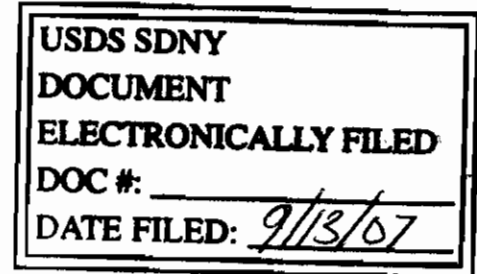
Brian McMahon

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E-mail: brian.mcmahon@alston.com

September 12, 2007

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007-1312



Re: Uni-Screw Europe BV v. UniScrew Worldwide, Inc. and Stewart Tipping, No. 07 CV 7033

Dear Judge Castel:

We represent Plaintiff Uni-Screw Europe BV in the referenced litigation. Pursuant to Your Honor's Individual Practices, we respectfully request that the pretrial conference scheduled for September 28, 2007 at 2:15 p.m. be adjourned until February, 2008, to allow time for the service of the Complaint to be completed on Defendant Stewart Tipping. No prior requests for adjournment have been made.

Plaintiff served the Complaint on Defendant UniScrew Worldwide, Inc. on August 9, 2007, and initiated service pursuant to the Hague Convention on the Service of Judicial and Extrajudicial Documents in Civil or Commercial Matters ("Hague Convention") for Defendant Stewart Tipping (a resident of the United Kingdom) on August 17, 2007. Service pursuant to the Hague Convention has not yet been effected, and we are informed that such service typically takes from one to three months to complete.

Further, while we are aware that Defendant UniScrew Worldwide is represented by counsel (copied on this letter), such counsel has not entered an appearance in this action, and Defendant UniScrew Worldwide has not responded to the Complaint.

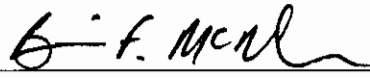
Defendant UniScrew Worldwide's response to the Complaint is now more than two weeks overdue, and it appears that this Defendant does not intend to appear, plead or otherwise defend the claims pending against it. Plaintiff intends to request Entry of Default from the Clerk of the Court by the end of this week, and intends to move for entry of default judgment against Defendant UniScrew Worldwide shortly thereafter.

The Honorable P. Kevin Castel
September 12, 2007
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In light of these facts and circumstances, we believe that an Initial Pretrial Conference would be premature at this time, and we thus respectfully request that the Court adjourn the Initial Pretrial Conference until February, 2008, to allow time for service of the Complaint pursuant to the Hague Convention to be completed, and time for Defendant Stewart Tipping to respond according to the time permitted him by the Federal Rules of Civil Procedure.

Conference adjourned
from September 28
to January 25, 2008 at
9:30am.
SO ORDERED
USPJ
9-13-07

Respectfully submitted,



Brian McMahon*
Admitted *pro hac vice*

*Not Licensed to Practice in NC; Licensed
Only in NY and CA

BFM:bfm

cc: Mr. Stewart Tipping, Defendant, unrepresented by counsel (by overnight delivery)
Greg Hall, Esq., counsel for Defendant UniScrew Worldwide, Inc. (by overnight
delivery)